

Metropolitan Water District of Southern California

Comments on
Draft Sacramento/San Joaquin Delta Water Supply Paper

The Draft Sacramento/San Joaquin Delta Water Supply Paper (Water Supply Paper) prepared for the Bay-Delta Oversight Council (BDOC) contains information taken largely from the Department of Water Resources (DWR) Draft Bulletin 160-93. While the statewide demand and supply information in the Water Supply Paper does not directly relate to the focus of the paper, i.e., the Delta, the material is good background information which highlights the significant supply needs of the State, much of which is dependent on the Delta.

Metropolitan provided comments to DWR on their Draft Bulletin 160-93. Recognizing that several of these comments do not directly relate to BDOC's focus on a Delta solution, we are including them to express our concern regarding some of the background information included in the Water Supply Paper. Our primary concerns are summarized below. A more detailed discussion of these concerns is attached as "Excerpts from Metropolitan's Comments to DWR on Draft Bulletin 160-93".

- Metropolitan agrees that fixing the Delta should be the first priority. Further, a joint State-federal process is essential for the timely development of physical improvements and environmental protections in the Delta that will protect water supply reliability.
- The State should expedite implementation of Level I options, including short-term measures such as water transfers.
- Initiation of a plan to evaluate options to eliminate the significantly large future water supply/demand imbalance after development of Level I facilities should begin immediately.
- While rationing is certainly one option that may be implemented to deal with shortages under extreme hydrologic conditions, rationing should not be considered as a Level I option.
- Water transfers should be included as a supply option to increase State Water Project supplies.

- The statewide water balance masks regional water supply imbalances.
- Accomplishments of water supply augmentation options may be overstated as a result of operational and regulatory constraints not considered when these options were initially studied.
- An average-year replenishment demand is needed to offset the large increase in drought-year groundwater pumping if this drought supply is to continue to be available given the overdraft occurring in some areas even in average water supply years.
- There should be a recognition that the determination of acceptable reliability levels is a regional issue which should be made at the regional level.
- The water supply paper should define the term "drought" as it is used in the California Water Balance and other tables and discussions.